

MARKS & KLEIN, LLP

Brent M. Davis, Esq.

Justin M. Klein, Esq.

63 Riverside Avenue

Red Bank, N.J. 07701

Tel: (732) 747-7100

Fax: (732) 219-0625

justin@marksklein.com

brent@marksklein.com

Attorneys for Plaintiff

APFA, Inc.

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

APFA, INC.

Plaintiff,

vs.

UATP MANAGEMENT, LLC,

Defendant.

)
)
)
)
)
)
)
)
)
)
)

Case No. 3:20-cv-05007-MAS-DEA

**STIPULATION AND
ORDER**

Plaintiff APFA, Inc. and Defendant UATP Management, LLC, by and through the undersigned counsel, hereby submit this Stipulation and Proposed Order and state as follows:

WHEREAS on June 16, 2020, Plaintiff filed its Motion for Injunctive Relief [Dkt. No. 10];

WHEREAS on June 29, 2020, Defendant filed its Motion to Dismiss [Dkt. No. 11];

WHEREAS on July 6, 2020, Defendant filed its Opposition to Plaintiff's Motion for Injunctive Relief [Dkt. No. 12];

WHEREAS Plaintiff's Reply Brief in Support of its Motion for Injunctive Relief is currently due on or before July 13, 2020;

WHEREAS Plaintiff's Opposition to Defendant's Motion to Dismiss is currently due on or before July 20, 2020;

WHEREAS Defendant's Reply Brief in Support of its Motion to Dismiss is currently due on or before July 27, 2020;

WHEREAS no previous requests have been made for extensions of these deadlines; and

WHEREAS good cause exists to permit the parties a brief extension of these deadlines, including that the Covid-19 pandemic has created difficulties in meeting ordinary court deadlines.

THEREFORE IT IS HEREBY STIPULATED AND AGREED by and between the undersigned counsel for Plaintiff and the undersigned counsel for Defendant that:

- Plaintiff's deadline to file its Reply Brief in Support of its Motion for Injunctive Relief be extended from July 13, 2020 to July 29, 2020;
- Plaintiff's deadline to file its Opposition to Defendant's Motion to Dismiss be extended from July 20, 2020 to August 3, 2020; and

- Defendant's deadline to file its Reply Brief in Support of its Motion to Dismiss extended from July 27, 2020 to August 26, 2020.

Dated: July 11, 2020

MARKS & KLEIN, LLP
By: /s/ Brent M. Davis

Brent M. Davis, Esq.
Justin M. Klein, Esq.
63 Riverside Ave.
Red Bank, NJ 07701
Tel: (732) 747-7100
Fax: (732) 219-0625
brent@marksklein.com
justin@marksklein.com

Attorneys for Plaintiff

DLA PIPER LLP (US)
By: /s/ David S. Sager

David S. Sager, Esq.
William J. Diggs, Esq.
51 John F. Kennedy Parkway
Suite 120
Short Hills, NJ 07078
Tel: (973) 520-2550
Fax: (973) 520-2551
david.sager@dlapiper.com
william.diggs@dlapiper.com

Attorneys for Defendant

SO ORDERED, this 13th day of July 2020.

s/Douglas E. Arpert
Hon. Douglas E. Arpert, U.S.M.J.